

# **EXHIBIT 11**

Turner and Newall Inc. Projected Liabilities  
for Asbestos Personal Injury Claims

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November 29, 2004

Plaintiffs' Exhibit 2



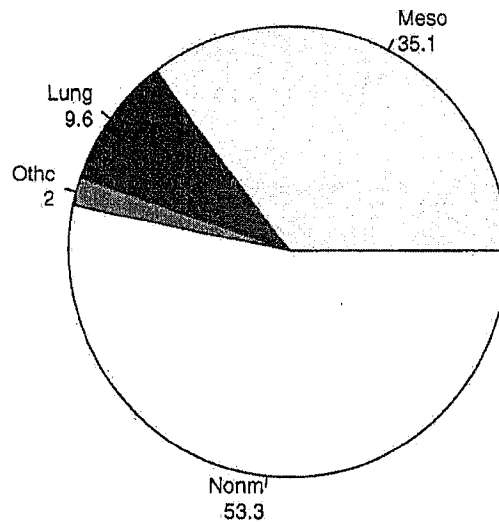
Table 17: Forecast of Indemnity for U.S. Pending Claims

Disease	Number of Reallocated Claims	Average Resolution	Indemnity (\$millions)
Meso	3,002	\$163,711	\$491.5
Lung	4,891	27,630	135.2
Othc	2,080	13,170	27.4
Nonm	119,776	6,242	747.6
Unsp	4,487	0	0.0
Total	134,236	NA	\$1,402

Note: Average resolution amounts and indemnity are expressed in year 2001 dollars. Average resolution amounts from Table 11.

Figure 4 compares graphically the percent of total indemnity that would be paid to claimants with each type of asbestos disease.

Figure 4: Percentage Distribution of Indemnity Amounts for Pending Claims, by Disease



### 6.3. Projections of Number And Timing of Future Claims in the U.S.

We use standard methods for forecasting future asbestos claims that were first developed for insurance companies in the early 1980s and are now widely used by all types of parties in asbestos litigation. The method calculates the number, timing and types of future claims based

Turner-Newall

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Table A3: U.S. T&N Forecasts as of October 1, 2001

Filing Year	Increasing Model					No Increase Model				
	Meso	Lung	Othc	Nonm	Total	Meso	Lung	Othc	Nonm	Total
[2001]	331	430	148	9,264	10,174	331	430	148	9,264	10,174
2002	1,325	1,720	593	37,057	40,694	1,325	1,720	593	37,057	40,694
2003	1,451	1,858	682	41,810	45,801	1,321	1,655	570	36,126	39,672
2004	1,574	1,991	767	46,624	50,956	1,316	1,599	549	35,292	38,756
2005	1,696	2,110	843	51,382	56,031	1,311	1,543	529	34,458	37,841
2006	1,817	2,215	911	56,063	61,006	1,305	1,486	509	33,623	36,923
2007	1,810	2,131	875	54,616	59,432	1,300	1,430	489	32,790	36,009
2008	1,789	2,029	835	52,545	57,178	1,271	1,362	466	31,568	34,667
2009	1,728	1,928	794	50,473	54,923	1,242	1,294	444	30,346	33,326
2010	1,687	1,826	754	48,403	52,670	1,212	1,226	421	29,124	31,983
2011	1,647	1,725	714	46,331	50,417	1,183	1,157	399	27,902	30,841
2012	1,606	1,623	673	44,260	48,162	1,154	1,089	376	26,680	29,299
2013	1,536	1,528	632	41,917	45,613	1,103	1,025	353	25,282	27,763
2014	1,466	1,432	591	39,575	43,064	1,053	961	330	23,883	26,227
2015	1,396	1,337	550	37,232	40,515	1,003	897	307	22,484	24,891
2016	1,326	1,241	509	34,890	37,966	953	833	284	21,086	23,156
2017	1,256	1,146	468	32,547	35,417	903	769	261	19,688	21,621
2018	1,186	1,053	431	30,270	32,940	852	707	240	18,323	20,122
2019	1,115	960	393	27,992	30,460	801	644	220	16,959	18,624
2020	1,044	867	356	25,714	27,981	750	582	199	15,594	17,125
2021	973	774	319	23,437	25,503	699	520	178	14,230	15,627
2022	902	681	282	21,160	23,025	648	457	157	12,866	14,128
2023	832	615	255	19,310	21,012	598	413	142	11,748	12,901
2024	763	549	228	17,461	19,001	548	369	127	10,632	11,676
2025	693	483	200	15,611	16,987	498	324	112	9,514	10,448
2026	623	417	173	13,762	14,975	448	280	97	8,398	9,223
2027	553	351	146	11,914	12,964	398	236	82	7,280	7,996
2028	499	312	130	10,677	11,618	359	210	73	6,528	7,170
2029	447	276	114	9,490	10,327	321	185	64	5,804	6,374
2030	396	242	101	8,394	9,133	285	163	57	5,135	5,640
2031	350	211	87	7,342	7,990	251	141	49	4,494	4,935
2032	306	183	76	6,405	6,970	220	123	42	3,921	4,306
2033	267	172	65	5,717	6,221	192	115	36	3,500	3,843
2034	231	134	56	4,771	5,192	166	90	31	2,923	3,210
2035	200	113	47	4,085	4,445	144	76	26	2,505	2,751
2036	170	94	39	3,442	3,745	122	63	22	2,113	2,320
2037	145	79	32	2,896	3,152	104	53	18	1,779	1,954
2038	121	64	27	2,406	2,618	87	43	15	1,477	1,622
2039	102	51	22	1,987	2,162	73	34	12	1,222	1,341
Total	37,339	36,951	14,918	999,232	1,088,440	27,850	26,304	9,027	643,598	706,779

Note: The entries for 2001 are for 1/4 of a year.